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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

CASE NO. 2:20-CR-0212 DJC

13 Plaintiff,

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

14 v.
15 MATTHEW GOYDER,

16 Defendant.

DATE: June 22, 2023
TIME: 9:00 a.m.
COURT: Hon. Daniel J. Calabretta

17
18 STIPULATION

19 Plaintiff United States of America, by and through its counsel of record, Roger Yang, and
20 defendant, Matthew Goyder by and through defendant's counsel of record, Linda Parisi, hereby stipulate
21 as follows:

22 1. By previous order, this matter was set for status on June 22, 2023.

23 2. This matter has been reassigned from Judge Troy L. Nunley to Judge Daniel J. Calabretta
24 on April 3, 2023, and by this stipulation, defendant now requests that the currently scheduled status
25 conference be put on Judge Calabretta's docket for June 22, 2023. Time under the Speedy Trial Act was
26 previously excluded through June 22, 2023, under Local Code T4.

27 3. The parties agree and stipulate, and request that the Court find the following:

28 a) The government has represented that the discovery associated with this case

1 includes approximately 6,000 pages of documents as well as digital evidence. All of this
2 discovery has been either produced directly to counsel and/or made available for inspection and
3 copying.

4 b) Counsel for defendant desires additional time to consult with her client, review
5 current charges, conduct investigation and research related to the charges, to discuss potential
6 resolutions with her client, and otherwise prepare for trial. Counsel will be in a capital trial
7 between now and the end of May, so this continuance will also ensure continuity of counsel.

8 c) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny her the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of March 30, 2023 to June 22, 2023,
17 inclusive, is deemed excludable pursuant to the Court's previous order on March 29, 2023 (Doc.
18 14) and 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it resulted from a continuance
19 granted by the Court at defendant's request on the basis of the Court's finding that the ends of
20 justice served by taking such action outweigh the best interest of the public and the defendant in
21 a speedy trial.

22 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
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5. Speedy Trial Act dictate that additional time periods are excludable from the period
within which a trial must commence.
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5 IT IS SO STIPULATED.
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Dated: May 1, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ ROGER YANG
ROGER YANG
Assistant United States Attorney

Dated: May 1, 2023

/s/ LINDA PARISI
LINDA PARISI
Counsel for Defendant
MATTHEW GOYDER

15 **FINDINGS AND ORDER**

16 The Court, having received, read, and considered the parties' stipulation, and good cause
17 appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court confirms the
18 previously set status conference on June 22, 2023 and places it on the newly assigned judge's calendar
19 for the same date at 9:00 a.m. The Court also finds that by previous order, the Court excluded time from
20 March 30, 2023, to and including June 22, 2023, from the computation of time within which the trial of
21 this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and
22 (B)(iv), and Local Code T-4. Doc. 14.

24 IT IS SO FOUND AND ORDERED this 1st day of May, 2023
25

26 /s/ Daniel J. Calabretta
27 THE HONORABLE DANIEL J. CALABRETTA
28 UNITED STATES DISTRICT JUDGE